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# IN THE UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

J.B. INTERNATIONAL, LLC d/b/a	§	
J. BIRNBACH,	§	
	§	
Plaintiff,	§	
	§	Civil Action No. 3:22-cv-01422
V.	§	
	§	
WILLIAM NOBLE RARE JEWELS, L.P.,	§	
and WILLIAM NOBLE,	§	
	§	
Defendants.	-	

# **DEFENDANTS' WITNESS LIST FOR TRIAL**

Pursuant to the Court's Scheduling Order, Doc. No. 27, and FED. R. CIV. P. 26(a)(3)(A)-(B) Defendants William Noble Rare Jewels, L.P. ("*WNRJ*") and William "Bill" Noble (collectively, "*Defendants*") and hereby submit this, their Witness List for the January 16, 2024 trial in this matter.

## I. PROBABLE WITNESSES

Witness Name	Address	Brief Narrative of Testimony	Expected Length
Jonathan Birnbach	c/o Kaminski Law,PLLC	Mr. Birnbach is expected	4-5 hours
	Shanna M. Kaminski	to testify regarding the	
	P.O. Box. 725220	business dealings between	
	Berkley, MI 48072	the parties and his alleged	
	(248) 462-7111	damages.	
William "Bill" Noble	c/o Crawford, Wishnew &	Mr. Noble is expected to	4-5 hours
	LANG PLLC	testify regarding the	
	Trey Crawford	business dealings between	
	1700 Pacific Avenue, Suite 2390	the parties. He will testify	
	Dallas, Texas 75201	in his capacity both	
	Telephone: (214) 817-4500	individually and as a	
	Facsimile: (214) 602-6551	corporate representative of	
		WNRJ.	
Trey Crawford	c/o Crawford, Wishnew &	Mr. Crawford is expected	15 minutes
	LANG PLLC	to testify regarding	
	Trey Crawford	reasonable and necessary	
	1700 Pacific Avenue, Suite 2390	attorney's fees.	
	Dallas, Texas 75201		

Telephone: (214) 817-4500	
Facsimile: (214) 602-6551	

# II. POSSIBLE WITNESSES

Witness	Address	Brief Narrative of	Expected Length
Name		Testimony	
Jeffrey A.	Unknown (will	Mr. Mitchell is	2-3 hours
Mitchell	supplement if able)	expected to testify	
		regarding the terms of	
		the Letter Agreement.	
Trey	c/o Crawford, Wishnew &	Mr. Crawford is	15 minutes
Crawford	LANG PLLC	expected to testify	
	Trey Crawford	regarding reasonable	
	1700 Pacific Avenue, Suite 2390	and necessary	
	Dallas, Texas 75201	attorney's fees.	
	Telephone: (214) 817-4500		
	Facsimile: (214) 602-6551		

## III. EXPERT WITNESS

Witness	Address	Brief Narrative of	Expected Length
Name		Testimony	
Trey	c/o Crawford, Wishnew &	Mr. Crawford is	15 minutes
Crawford	LANG PLLC	expected to testify	
	Trey Crawford	regarding reasonable	
	1700 Pacific Avenue, Suite 2390	and necessary	
	Dallas, Texas 75201	attorney's fees.	
	Telephone: (214) 817-4500		
	Facsimile: (214) 602-6551		

# IV. RECORD CUSTODIANS

Witness	Address	Brief Narrative of	<b>Expected Length</b>
Name		Testimony	
William	c/o Crawford, Wishnew &	Mr. Noble is expected	4-5 hours
"Bill"	LANG PLLC	to testify regarding	
Noble	Trey Crawford	the business dealings	
	1700 Pacific Avenue, Suite 2390	between the parties.	
	Dallas, Texas 75201	He will testify in his	
	Telephone: (214) 817-4500	capacity both	
	Facsimile: (214) 602-6551	individually and as a	
		corporate	
		representative of	
		WNRJ.	

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Defendants hereby cross-designate any and all individuals and/or entities designated by Plaintiff in Plaintiff's Witness List(s), whether in Plaintiff's case-in-chief or in rebuttal. Defendants reserve the right to call witnesses in rebuttal. Defendants reserve the right to supplement or amend their Witness List, up to and during Trial.

Dated: December 8, 2023

Respectfully submitted,

/s/ Trey Crawford
Trey Crawford
Texas Bar No. 24059623
tcrawford@cwl.law
Cameron Jean
Texas Bar No. 24097883
cjean@cwl.law

CRAWFORD, WISHNEW & LANG PLLC 1700 Pacific Avenue Suite 2390 Dallas, Texas 75201 (214) 817-4500 Telephone (214) 602-6551 Fax

#### ATTORNEYS FOR DEFENDANTS

#### **CERTIFICATE OF SERVICE**

I hereby certify that on December 18, 2023, a true and correct copy of the foregoing document was forwarded to all counsel of record pursuant to the Federal Rules of Civil Procedure.

/s/ Trey Crawford
Trey Crawford